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 Johnson, and Robin Smith

UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA  
 SAN FRANCISCO DIVISION

SALLY STEINHART,  
 Plaintiff,

v.

COUNTY OF SONOMA, et al.,  
 Defendants.

No. CV-10-00841 RS

**SECOND STIPULATION FOR  
 ORDERS TO: (1) EXTEND TIME FOR  
 FILING A THIRD AMENDED  
 COMPLAINT; (2) EXTEND TIME TO  
 RESPOND TO COMPLAINT AND FILE  
 ANTI-SLAPP MOTION; AND (3)  
 CONTINUE CASE MANAGEMENT  
 CONFERENCE; [PROPOSED] ORDER**

This joint stipulation is entered into by and between Plaintiff in pro per, Sally Steinhart ("Plaintiff"), and Defendants the County of Sonoma, former Sheriff-Coroner William Cogbill, and County employees Michael Shanahan, Caroline Jaap, Jo Weber, Nicholas Honey, Jerry Allen, Betty Johnson and Robin Smith (collectively, "County Defendants"). Through this stipulation, these parties request that the Court enter an order: (1) further extending the time for Plaintiff to file a Third Amended Complaint ("TAC") through June 27, 2011; (2) extending the time for County Defendants to file a response to the TAC and to file an Anti-SLAPP Motion under California Code of Civil Procedure Section 425.16 through July 29, 2011; and (3) continuing the Case Management Conference, currently set for July 14, 2011, to August 25, 2011. Defendant the State Department of

1 Social Services and other named defendants have not appeared in this action, and are not parties to  
2 this stipulation.

### 3 **RECITALS**

4 A. Plaintiff initiated this action on February 26, 2010, and filed her First Amended  
5 Complaint on June 21, 2010 (Dkt. No. 8). County Defendants responded by filing their Motion to  
6 Dismiss the First Amended Complaint and Motion for More Definite Statement on July 26, 2010  
7 (Dkt. No. 12) (hereinafter, the “Motions”). The Court resolved the County Defendants’ Motions on  
8 February 7, 2011, through its “Order Granting in Part and Denying in Part Motion to Dismiss and  
9 Denying Motion for a More Definite Statement” (Dkt. No. 34) (hereinafter, the “2/7/11 Order”).  
10 Thereafter, Plaintiff timely filed her Second Amended Complaint on March 9, 2011 (Dkt. No. 38).

11 B. The parties have entered two previous stipulations, which the Court has approved,  
12 related to the filing of a Third Amended Complaint (“TAC”) and related responses. (Dkt. Nos. 41  
13 and 43.) Most recently, on April 29, 2011, this Court approved a stipulation of the parties and  
14 entered an order: (1) permitting Plaintiff to file a TAC through May 20, 2011; (2) providing County  
15 Defendants through June 28, 2011, to file a respond to the TAC and an Anti-SLAPP motion under  
16 California Code of Civil Procedure Section 425.16. (Dkt. No. 43.)

17 C. The Case Management Conference in this case is currently set for July 14, 2011, at  
18 10:00 a.m. (Dkt. No. 41.)

19 D. Plaintiff has requested additional time in which to prepare and file her TAC through  
20 June 27, 2011, based on her calendar and due dates in other cases. Further, pursuant to the parties’  
21 informal discovery process, County Defendants have located additional information and documents  
22 to provide to Plaintiff to consider in connection with preparing her TAC, which have not yet been  
23 provided to her. Providing Plaintiff with additional time in which to file her TAC will permit her to  
24 consider such information and conform her TAC to the Court’s 2/7/11 Order.

25 E. County Defendants agree to Plaintiff’s request for an extension of time to prepare and  
26 file her TAC. In return, Plaintiff has agreed to extend the time in which County Defendants may file  
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1 a response to the TAC, and an Anti-SLAPP Motion under California Code of Civil Procedure  
2 Section 425.16, through July 29, 2011.<sup>1</sup>

3 F. In light of the above stipulated dates, the parties have also agreed and request the  
4 Court to continue the Case Management Conference from its current date of July 14, 2011, to  
5 August 25, 2011, at 10:00 a.m.

6 WHEREFORE, the parties to this stipulation hereby agree and request entry of a court order  
7 as follows:

### 8 STIPULATION

9 1. The parties request that the time in which Plaintiff may file a third amended  
10 complaint in this case be extended through and including June 27, 2011.

11 2. The parties request that time in which County Defendants may file a response to the  
12 current Second Amended Complaint or any third amended complaint (if filed) be extended through  
13 and including July 29, 2011.

14 3. The parties request that the time in which County Defendants may file their Anti-  
15 SLAPP motion under California Code of Civil Procedure Section 425.16 as to certain State Law  
16 claims alleged herein be extended through and including July 29, 2011.

17 4. The parties request that the Case Management Conference, currently set for July 14,  
18 2011, be continued to August 25, 2011, at 10:00 a.m. A joint case management conference  
19 statement shall be filed one week prior to the conference.

20 5. This stipulation does not prevent or preclude the parties from seeking additional relief  
21 from this Court, to amend this stipulation and order or otherwise.

22 Respectfully submitted,

23 Dated: May 20, 2011

Bruce D. Goldstein, County Counsel

24 By: /s/ Anne L. Keck  
25 Anne L. Keck, Deputy County Counsel  
26 Attorneys for County Defendants

27 <sup>1</sup>This Court has the discretion under California Code of Civil Procedure Section 425.16(f) to  
28 extend the initial 60-day filing period for Anti-SLAPP motions to “any later time upon terms it  
deems proper.”

1 Dated: May 20, 2011

Sally Steinhart, Plaintiff in pro per

2 By: /s/ Sally Steinhart  
3 Sally Steinhart

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~~[PROPOSED]~~ ORDER

Pursuant to and in accordance with the foregoing Stipulation, and with good cause appearing, it is hereby ordered as follows:

1. The time in which Plaintiff may file a third amended complaint in this case is extended through and including June 27, 2011.

2. The time in which County Defendants may file a response to the current Second Amended Complaint or any third amended complaint (if filed) is extended through and including July 29, 2011.

3. The time in which County Defendants may file their Anti-SLAPP motion under California Code of Civil Procedure Section 425.16 as to certain State Law claims alleged herein is extended through and including July 29, 2011.

4. The Case Management Conference, currently set for July 14, 2011, is continued to August 25, 2011, at 10:00 a.m. A joint case management conference statement shall be filed one week prior to the conference.

IT IS SO ORDERED.

Date: 5/24/11

  
HONORABLE RICHARD SELBORG  
United States District Judge